
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Claimant Cory Fleming
Settlement Program ID # 100004892

PETITION TO ESTABLISH
ATTORNEY'S LIEN

Petitioner, Farrise Law Firm, P.C. pursuant to an executed Retainer for Legal Services come now and states as follows:

1. Petitioner is an attorney at law admitted to practice before the courts of California, and files this Petition to establish a lien for attorney's fees, as set forth hereinafter.
2. On or about September 21, 2016, Petitioner, Farrise Law Firm, P.C., was retained and employed by the Claimant pursuant to an Retainer Agreement for Legal Services to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football related concussions, head, and brain injuries.
3. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, the former client will not owe a legal fee. If Farrise Law Firm, P.C., obtains a settlement, Claimant will pay to Petitioner twenty-three and one third percent (**23.33%**) of the gross recovery, plus reimbursement of expenses.
4. When Petitioner entered into contract with Claimant, Petitioner entered into the risk and expense of the litigation.
5. From the date the Petitioner was authorized to proceed on behalf of the Claimant, the Petitioner has actively and diligently investigated, prepared, and pursued Claimant's claims, and has taken all steps necessary to prosecute those claims, including, but not

limited to, correspondence and communications with the client, preparation and review of the former client's factual and legal circumstances, retaining experts, drafting and providing updates, analyzing Claimant's medical status and need for medical testing, etc.

6. The Plaintiff has discharged the Petitioner as his attorney in this matter, and it is expected that a new attorney will be pursuing representation of the Plaintiff in this action.
7. The Petitioner was not terminated due to any malfeasance or other improper action.
8. The Petitioner claims the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Claimant in this action.

WHEREFORE, the Petitioner prays:

1. That an attorney's lien be established;
2. That the amount of the lien be determined.
3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement in this action, as a first priority lienholder, in the face of any other valid lien.
4. That the NFL Concussion Settlement Claims Administrator be prohibited from paying to the Claimant, or any other lienholder any settlement proceeds until said attorney's fees and cost lien has been satisfied; and
5. For such other further relief as this Court deems just.

Dated: October 23, 2017

Respectfully submitted,

FARRISE LAW FIRM, P.C., P.C.

A handwritten signature in black ink, appearing to read 'Simona', followed by a horizontal line.

Simona A. Farrise, Esq.

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Petition to Establish Attorney's Lien to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the litigation.

Dated: October 23, 2017

A handwritten signature in black ink, appearing to read 'S. Farrise', is positioned above a solid horizontal line.

Simona A. Farrise, Esq.
State Bar No. #171708
27 W. Anapamu St., #257
Santa Barbara, CA 93101
Tel. (310) 424-3355
Fax. (510) 588-4536
sfarrise@farriselaw.com

ATTORNEY FOR PLAINTIFFS